

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

|                          |   |                            |
|--------------------------|---|----------------------------|
| UNITED STATES OF AMERICA | ) |                            |
|                          | ) | Case No. 21-265 (PKC)      |
| v.                       | ) |                            |
|                          | ) | HON. PAMELA K. CHEN        |
|                          | ) |                            |
| CONGYING ZHENG,          | ) | MOTION FOR MODIFICATION OF |
|                          | ) | BOND AND CONDITIONS OF     |
| Defendant.               | ) | RELEASE                    |

The undersigned PAUL A. GOLDBERGER, ESQ., affirms under penalty of perjury, that:

1. I represent defendant Congying Zheng in the above-captioned case.
2. At present, Mr. Zheng is placed on curfew from 9am to 9pm Monday to Sunday with a travel restriction within the Eastern District of New York.
3. Mr. Zheng has a doctor's appointment on May 26, 2022 at 10am. He would like to get permission to see Dr. Marcus Loo, a urologist at 254 Canal Street, # 3001, New York, New York 10013. Due to the location of the doctor's office, his current bond release conditions only allow the defendant to travel within the Eastern District of New York. The pretrial services requested that we should submit an application with the Court for an order.
4. We respectfully request that the Court permit the defendant to visit his urologist on the date above.

WHEREFORE, the Defendant respectfully moves this Court for an Order modifying the conditions of Mr. Zheng's pre-trial release so that he can visit his urologist, Dr. Marcus Loo on May 26<sup>th</sup> at 10am at the location above.

Respectfully submitted,

Dated: New York, New York  
May 24, 2022

BY: /s/  
PAUL A. GOLDBERGER